

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

IN RE:	§	CASE NO. 24-10119-smr
	§	
1001 WL, LLC	§	CHAPTER 7
	§	
DEBTOR.	§	

**EMERGENCY MOTION TO DISQUALIFY MATTHEW OKIN AND
OKIN ADAMS BARTLETT CURRY LLP AS BANKRUPTCY COUNSEL
TO DOUGLAS BRICKLEY, CHAPTER 7 TRUSTEE**

This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.

Represented parties should act through their attorney.

Emergency Relief Has Been Requested. If the Court considers the Motion on an emergency basis, then you will have less than 21 days to answer. If you object to the requested relief or if you believe that the emergency consideration is not warranted, you should file an immediate response.

TO THE HONORABLE SHAD M. ROBINSON,
U.S. BANKRUPTCY JUDGE:

Ali Choudhri (the “Movant”), hereby moves on an emergency basis to disqualify Matthew Okin and the law firm of Okin Adams Bartlett Curry LLP as Bankruptcy Counsel to Douglas Brickley, Chapter 7 Trustee in this proceeding pursuant to 11 U.S.C. §§ 105(a), and 327(a), Federal Rule of Bankruptcy Procedure 2014, and Local Rule of Bankruptcy Procedure 2014-1, and in support thereof respectfully shows the Honorable Court as follows:

1. Movant brings this motion to disqualify Matthew Okin and his law firm Okin Adams Bartlett Curry LLP (collectively, “Okin Adams”) due to their direct conflicts of interest

with the Bankruptcy Estate. Due to his firm's prior connections and ongoing interests adverse to the bankruptcy estate of Jetall Companies, Inc., Okin Adams is not "disinterested" within the meaning of 11 U.S.C. §§ 101(14) and 327(a), and holds interests materially adverse to the estate under *In re West Delta Oil Co.*, 432 F.3d 347, 355 (5th Cir. 2005) and *In re American Int'l Refinery*, 676 F.3d 455, 461 (5th Cir. 2012). Therefore, Okin Adams may not serve as counsel to Douglas Brickley, Chapter 7 Trustee (the "Trustee") in this bankruptcy case pursuant to 11 U.S.C. § 327(a).

2. The Trustee was elected at the 341 meeting of creditors held on April 22, 2025.¹

3. The following day, on April 23, 2025 the Trustee was added to the case. On the same day, Okin Adams appeared on behalf of the Trustee. To date, no application to employ Okin Adams has been filed pursuant to 11 U.S.C. § 327(a) and Fed. R. Bankr. P. 2014(a), and no verified statement disclosing Okin Adams' connections to the Debtor, creditors, and any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee has been filed.

4. Okin Adams previously represented ASR 2401 Fountainview, LP and ASR 2401 Fountainview, LLC jointly administered debtors in Case Nos. 14-35322 and 14-35323, before the Bankruptcy Court for the Southern District of Texas. In connection with that engagement, Ali Choudhri directed the actions of Okin Adams in representing the Debtors in those jointly administered cases, in which a chapter 11 plan was confirmed and Jetall Companies, Inc. was the purchaser of the Debtor's assets under that plan. Through its representation of the Debtors under Mr. Choudhri's direction, Okin Adams obtained privileged and confidential information including: (1) Mr. Choudhri's litigation strategies and decision-making processes in bankruptcy proceedings; and (2) his mental impressions and strategic considerations regarding business

¹ The Movant reserves all rights regarding the election of the Trustee.

operations. This confidential information is directly relevant to and could be used adversely in the current matter against Mr. Choudhri. This violates Rule 1.09(a)(2) of the Texas Rules of Professional Conduct and serves as an independent basis for disqualifying Okin Adams.

5. An emergency hearing is necessary in this matter due to the immediate and ongoing harm being caused by Okin Adams' continued representation of Doug Brickley while lacking disinterestedness and possessing and potentially utilizing privileged and confidential information relating to Mr. Choudhri. The following factors demonstrate the urgency of this situation: (A) Okin Adams previously represented ASR 2401 Fountainview, LP and ASR 2401 Fountainview, LLC while under the direction of Mr. Choudhri and obtained substantial privileged and confidential information during the course of that representation; (B) the current matter is sufficiently and substantially related to Okin Adams' prior representation of ASR 2401 Fountainview, LP and ASR 2401 Fountainview, LLC, creating an inherent conflict of interest; (C) there is a reasonable probability that Okin Adams has access to and may be using confidential and privileged information developed during the representation of ASR 2401 Fountainview, LP and ASR 2401 Fountainview, LLC to Mr. Choudhri's detriment in the current proceedings; (D) the continued representation violates Texas Disciplinary Rules of Professional Conduct 1.06 and 1.09 regarding conflicts of interest and duties to former clients; (E) Mr. Choudhri faces immediate and irreparable harm if Okin Adams continues its representation of Douglas Brickley while possessing his privileged information; (F) the balance of equities favors immediate disqualification as Mr. Brickley can obtain alternative counsel while Mr. Choudhri cannot unring the bell of disclosed confidences; and (G) public policy strongly favors maintaining attorney-client confidentiality and preventing even the appearance of impropriety in legal proceedings.

6. Therefore, Movant respectfully requests an emergency hearing to address this

matter and seek immediate disqualification of Okin Adams from representing Doug Brickley in this proceeding.

WHEREFORE, PREMISES CONSIDERED, Movant respectfully requests that this Court enter an order: (1) disqualifying Matthew Okin and Okin Adams Bartlett Curry LLP from representing any party in this proceeding; and (2) granting such other and further relief to which Movant may be justly entitled.

Respectfully submitted,

/s/ Justin Rayome

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COUNSEL FOR ALI CHOUDHRI

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

IN RE:	§	CASE NO. 24-35761
	§	
JETALL COMPANIES, INC.,	§	CHAPTER 7
	§	
DEBTOR.	§	

**ORDER GRANTING
EMERGENCY MOTION TO DISQUALIFY MATTHEW OKIN AND
OKIN ADAMS BARTLETT CURRY LLP AS BANKRUPTCY COUNSEL
TO DOUGLAS BRICKLEY, CHAPTER 7 TRUSTEE**

On this day the Court considered the Emergency Motion to Disqualify Matthew Okin and Okin Adams Bartlett Curry LLP as Bankruptcy Counsel to Douglas Brickley, Chapter 7 Trustee. Based upon the motion, the arguments and evidence presented, the Court finds and concludes that Okin Adams Bartlett Curry LLP are not disinterested and may not be engaged to represent Douglas Brickley, Chapter 7 Trustee in this bankruptcy case. It is therefore

ORDERED that the Motion is hereby **GRANTED**; it is further

ORDERED that Matthew Okin and the firm of Okin Adams Bartlett Curry LLP is disqualified as serving as bankruptcy counsel to Douglas Brickley, Chapter 7 Trustee.

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CERTIFICATE OF SERVICE

I hereby certify that on 7th day of May, 2025, a true and correct copy of the foregoing pleading was served via regular US Mail or email where reflected by email address on each of the parties on the attached service list, which is the Court's mailing list for this case.

/s/ Justin Rayome

Justin Rayome

Label Matrix for local noticing
0542-1
Case 24-10119-smr
Western District of Texas
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Sun Apr 27 20:24:06 CDT 2025

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The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

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(u)See Attached

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Total	66